

Exhibit I

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October 20, 2015

By FedEx and Regular First Class Mail

Felice Ekelman

JACKSON LEWIS LLP

666 Third Avenue

New York, NY 10017

Re: Discovery Matters

Foster et al v. City of New York, Case No. 1:14-cv-04142-PGG

Dear Felice:

This is to follow up regarding the discovery issues, as well as our more recent emails regarding electronic search terms. This will confirm the following with respect to the plaintiffs' request for production of documents:

- Requests No. 2 and 18: Currently, defendant has produced some, but not all, documents responsive to these requests that relate to individual Phase I plaintiffs. We understand that the search for these documents is ongoing, but request that documents regarding an individual plaintiff be produced at least three (3) days prior to each respective plaintiffs' scheduled deposition.
- Request No. 4: To date, defendant has not produced any documents it has designated as responsive to this request.
- Request No. 5: To date, defendant has not produced any documents it has designated as responsive to this request.
- Requests No. 6, 18, and 22: In defendant's August 31, 2015 letter, you stated that you had contacted your client concerning Connections data and were waiting for a response. Please provide an update regarding the requests for these documents by October 23, 2015.
- Request No. 8: To date, defendant has not produced any documents it has designated as responsive to this request.

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- Request No. 9: To date, defendant has not produced any documents it has designated as responsive to this request.
- Request No. 21: To date, defendant has not produced any documents it has designated as responsive to this request. Again, we request that any documents responsive to this request be produced at least three (3) days in advance of each respective plaintiffs' scheduled deposition.
- Requests No. 24 and 26: In your August 31, 2015, letter, you indicated that you are continuing to search for these documents. Please provide an update regarding the requests for these documents by October 23, 2015. We request that any documents responsive to these requests be produced at least seven (7) days in advance of the 30(b)(6) deposition on FLSA Compliance, currently scheduled for November 3, 2015. At our pre-motion discovery call tomorrow, we can discuss this issue.
- Request No. 28: To date, defendant has not produced any documents it has designated as responsive to this request.
- Request No. 29: To date, defendant has not produced any documents it has designated as responsive to this request.

Thank you for providing emails on behalf of the Phase I plaintiffs. However, we have not yet heard from you regarding our request for email from management officials. During our September 16, 2015, conference call, you agreed that you would identify how many officials would be included if we agreed to limit our search of management emails to all officials at the level of Deputy or Assistant Director and above, including all payroll officials with the authority to make or implement policy on overtime. We can discuss as our pre-motion discovery conference whether defendant intend to produce management to management emails.

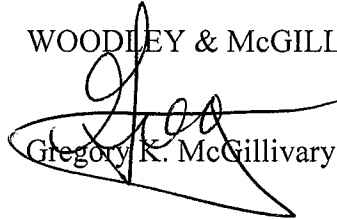
Further, defendant's supplemental productions have contained documents responsive to some of plaintiffs' requests. However, defendant has not produced an updated responsive pleading since its boiler-plate objections on December 23, 2014. As such, plaintiffs are unable to determine which documents produced are response to the plaintiffs' requests, or whether

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defendant intends to produce more documents responsive to these requests. Please provide an updated pleading indicating which documents are responsive to each of the plaintiffs' requests.

Sincerely,

WOODLEY & MCGILLIVARY

A handwritten signature in black ink, appearing to read "Greg", is written over the printed name "Gregory K. McGillivary". The signature is stylized and fluid.

cc: Hope Pordy, Esq. (via e-mail)